

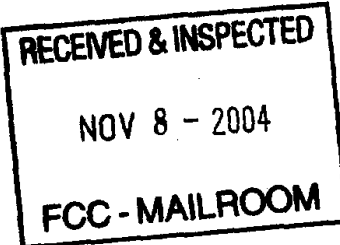


## HOUSTON INDEPENDENT SCHOOL DISTRICT

HATTIE MAE WHITE ADMINISTRATION BUILDING  
3830 RICHMOND AVENUE • HOUSTON, TEXAS 77027-5838

ABELARDO SAAVEDRA, Ph.D.  
Interim Superintendent of Schools

DOCKET FILE COPY ORIGINAL



William L. Edwards  
Technology and Information Systems  
Houston Independent School District  
3830 Richmond Avenue, Level 2 East  
Houston, TX 77027

Federal Communications Commission (FCC)  
Office of the Secretary  
445-12<sup>th</sup> Street SW  
Washington, D.C. 20554

November 5, 2004

Re: **CC DOCKET NO. 96-45 and CC DOCKET NO. 97-21**  
**Appeal of Denial of Service Delivery Extension Request by USAC, Schools and Libraries Division**

Dear Sirs:

Houston Independent School District is seeking a review and reversal of the denial for Service Delivery Extension request for the 2003 E-Rate funding year. Grounds for this appeal are established under USAC/Schools and Libraries Division's (SLD) defined criteria for Service Delivery Extensions, and were reasonably explained in the original Service Delivery Extension Request to the SLD.

Recipients of non-recurring services who wish to satisfy criterion (3) "The applicant requested an extension because the service provider is unable to complete delivery and installation for reasons beyond the service provider's control," must submit documentation to the SLD on or before the September 30 following the close of the Funding Year.

Reasoning provided to Schools and Libraries to justify the request for a Service Delivery Extension for 471 Application Number 367296, FRN 1000282 was based upon the school district's need for additional time to complete a portion of their school-based internal network cabling projects. Circumstances developed involving the need for a service delivery extension based upon reasons beyond the service provider's control. Given that Houston Independent School District's funding under FRN 1000282 was approved on September 23, 2003, the scheduled school-based internal connections projects began on October 8, 2003. Work on the projects was halted mid-November

No. of Copies rec'd 0  
List ABCDE

2003 due to the non-approval by USAC of FCC Form 486 and the subsequent non-release of funds. The District's contracted service provider experienced an *inability to invoice USAC for the E-Rate discounted portion of the projects for a period of five months* due to the untimely release of funding associated with FRN 1000282. With insufficient funds to continue jobs in progress or to proceed with new projects, the service provider refused to continue with the installations. The associated Form 486 was not approved until March 10, 2004, at which time talks resumed with the service provider about continuing the work.

On June 1, 2004, USAC contacted the District to request information regarding a report on an audit of the District's departmental Cabling Project Procedures produced by the HISD Internal Audit department. Vice President George McDonald requested that USAC be advised as to which measures would be taken by Houston ISD to address various issues identified in the audit. The internal review and the request for a response from USAC influenced the District in making a decision to pause all new work associated with school cabling projects until the inquiries were addressed.

Because of the delays referenced above, the service provider has since been unable to complete work at the remaining schools represented under this FRN 1000282 by the September 30, 2004 deadline due reasons over which they had no control.

We are seeking the original service delivery extension to September 30, 2005 with a commensurate 120-day extension beyond that for invoicing of all work done by the service provider. Please contact me if you require further information.

Sincerely,



William L. Edwards  
Assistant Superintendent  
713-892-7880

cc: Stephanie Shaw-Green, Analytical Computer Services  
Jacqueline Martin, Houston Independent School District

Enclosures (4)

Dated Letter from USAC Vice President

Dated Service Delivery Extension Request to SLD

Dated Fax to SLD Representative pertaining to SLD Extension Request

Dated FCC Form 486 Notification Letter

**Re: CC DOCKET NO. 96-45 and CC DOCKET NO. 97-21**  
**Appeal of Denial of Service Delivery Extension Request by USAC, Schools**  
**and Libraries Division**

**Dated Letter from USAC Vice President**



Universal Service Administrative Company  
Schools & Libraries Division

George McDonald  
Vice President

June 1, 2004

Dr. Kaye Stripling  
Superintendent of Schools  
Houston Independent School District  
3830 Richmond Avenue  
Houston, Texas 77027

RE: Internal Audit of Technology Department, May 4, 2004

Dear Dr. Stripling:

The Universal Service Administrative Company (USAC) has disbursed over \$124 million in Schools and Libraries Universal Service (E-rate) support for telecommunications services, Internet access and internal connections services provided to the Houston Independent School District (HISD) since 1998.

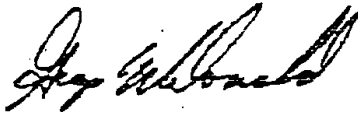
Through a television station in Houston, USAC has obtained a copy of a May 4, 2004 report on an audit performed by your Office of Internal Audit. The report is entitled "Review of HISD Technology Department Cabling Procedures and Related Internal Controls" and reports on excess cabling inventory in the warehouses used by your service providers, for which you and USAC may have paid. The report also discusses unusual processes for determining prices for work performed and for testing whether cable has been properly installed and is in good working order.

We are pleased to see that Houston ISD took the initiative to launch this audit. However, we are concerned that the findings of the report may indicate violations of Federal Communications Commission rules governing the E-rate program. Your auditor made specific recommendations in the report. USAC requests to be advised within 60 days of the date of this letter, of the actions that Houston ISD plans to take in response to the audit report. That will help us in our review of your 2004 requests for funding and to determine whether any past practices require action on our part.

It is USAC's goal to see that HISD participates in the E-rate program and sees the benefits for its students, and that its participation is fully compliant with all program rules. If you have any questions, please feel free to contact me at 202-776-0200.

Dr. Kaye Stripling  
Page 2  
June 1, 2004

Sincerely,



George McDonald  
USAC VP, Schools and Libraries Division

cc: Narda Jones, FCC

Re: **CC DOCKET NO. 96-45 and CC DOCKET NO. 97-21**  
**Appeal of Denial of Service Delivery Extension Request by USAC, Schools**  
**and Libraries Division**

**Dated Service Delivery Extension Request to SLD**

TRANSMISSION VERIFICATION REPORT

TIME : 08/27/2004 14:06  
NAME : TECH & INFO SYSTEMS  
FAX : 7138926749  
TEL : 7138926222  
SER.# : BRQJ3J675504

DATE, TIME  
FAX NO./NAME  
DURATION  
PAGE(S)  
RESULT  
MODE

08/27 14:05  
919735996542  
00:00:25  
02  
OK  
STANDARD  
ECM

Technology & Information Systems  
Houston Independent School District  
3830 Richmond Avenue, Level 2 East  
Houston, TX 77027  
713-892-6222  
713-892-6749 (facsimile)

facsimile transmittal

Attn: <u>Schools and Libraries Division</u>	Facsimile: <u>973 599-6542</u>
From: <u>Jacqueline Martin</u>	Date: <u>August 27, 2004</u>
Re: <u>Service Delivery Extension FRN</u> <u>1000282</u>	Pages: <u>2 ( including the cover page)</u>

cc: \_\_\_\_\_

Urgent ☒ For Review ☐ Please Comment ☐ Please Reply ☐ FYI

Attached is a service delivery deadline extension request for:  
Entity: Houston Independent School District, entity # 141223  
Form 471: 367296  
FRN: 1000282

Contact Name: Jacqueline Martin  
Phone: 713 892-6222 x307  
e-mail: jmartin6@houstonisd.org

Technology & Information Systems  
Houston Independent School District  
3830 Richmond Avenue, Level 2 East  
Houston, TX 77027  
713-892-6222  
713-892-6749 (facsimile)

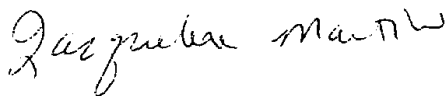
# facsimile transmittal

Attn: Schools and Libraries Division Facsimile: 973 599-6542  
From: Jacqueline Martin Date: August 27, 2004  
Re: Service Delivery Extension FRN Pages: 2 ( including the cover page)  
1000282  
cc: \_\_\_\_\_

☐ Urgent ☒ For Review ☐ Please Comment ☐ Please Reply ☐ FYI

Attached is a service delivery deadline extension request for:  
Entity: Houston Independent School District, entity # 141223  
Form 471: 367296  
FRN: 1000282

Contact Name: Jacqueline Martin  
Phone: 713 892-6222 x307  
e-mail: jmartin6@houstonisd.org



Jacqueline Martin  
Project Manager  
jmartin6@houstonisd.org





# HOUSTON INDEPENDENT SCHOOL DISTRICT

HATTIE MAE WHITE ADMINISTRATION BUILDING  
3830 RICHMOND AVENUE · HOUSTON, TEXAS 77027-5838

KAYE STRIPLING, Ed.D.  
Superintendent of Schools

To: Service Delivery Deadline Extension Request  
Schools and Libraries Division  
Box 125 – Correspondence Unit  
80 South Jefferson Road  
Whippany, NJ 07981

From: Jacqueline Martin  
Houston Independent School District  
Entity #: 141223  
3830 Richmond, Level 2 East  
Houston, TX 77027

Date: August 23, 2004

Re: Request Service Delivery Deadline Extension

Houston Independent School District (BEN 141223) would like to request a service delivery deadline extension. The information needed for this extension follows:

Contact Person Name: Jacqueline Martin

Contact Information: Houston Independent School District, Technology and Information Systems, 3830 Richmond Avenue, Level 2 East, Houston, TX 77027  
jmartin6@houstonisd.org  
phone: 713 892-6222 x307

Form 471 Application Number: 367296

Funding Request Number (FRN): 1000282

Service Provider Name: Analytical Computer Services

Service Provider Identification Number: 143010780

Reason for Service Delivery Deadline Extension request: Funding was awarded September 23, 2003. The Service Provider needs additional time to complete work due to reasons beyond their control. We request a service delivery extension to September 30, 2005.

Please let me know if there is anything else you need.

Sincerely,

*Jacqueline Martin, project manager*

Jacqueline Martin, Project Manager

Re: **CC DOCKET NO. 96-45 and CC DOCKET NO. 97-21**  
**Appeal of Denial of Service Delivery Extension Request by USAC, Schools  
and Libraries Division**

**Dated Fax to SLD Representative pertaining to SLD**  
**Extension Request**

**Martin, Jacqueline K**

---

**From:** Joan DaSilva [jdasilv@necaservices.com]  
**Sent:** Wednesday, September 15, 2004 11:07 AM  
**To:** Martin, Jacqueline K  
**Subject:** Fax : App #367296

Jackie,  
I have received your 9 page fax. Thanks

Joan Da Silva  
Associate Manager  
Schools and Libraries Division  
Phone: (973) 884-8273  
Fax : (973) 599 6555  
E-mail: jdasilv@necaservices.com

TRANSMISSION VERIFICATION REPORT

TIME : 09/15/2004 10:42  
NAME : TECH & INFO SYSTEMS  
FAX : 7138926749  
TEL : 7138926222  
SER.# : BROJ3J675504

DATE, TIME 09/15 10:40  
FAX NO./NAME 919735996555  
DURATION 00:01:37  
PAGE(S) 09  
RESULT OK  
MODE STANDARD  
ECM

Technology & Information Systems  
Houston Independent School District  
3830 Richmond Avenue, Level 2 East  
Houston, TX 77027  
713-892-6222  
713-892-6749 (facsimile)

facsimile transmittal

Attn: Joan Da Silva Facsimile: 973 599-6555  
From: Jacqueline Martin Date: Sept 15, 2004  
Re: FRN 1000282 reason for service Pages: 9 ( including the cover page)  
delivery extension

cc:

☐ Urgent ☒ For Review ☐ Please Comment ☐ Please Reply ☐ FYI

Ms. Da Silva,

Regarding your email dated Sept 14, 2004, the reason for the service delivery extension for FRN 1000282 is the following:

Service Provider needs additional time to complete the project associated with this FRN 1000282 since the Form 486 was not approved until March 10, 2004. Projects scheduled to begin October 2003 were started, then halted later in November 2003 due to non-release of funds. The service provider is unable to complete work at the reminder of the 235 schools represented in this FRN by 9/30/2004 due to the untimely approval of the Form 486.

I have attached a copy of the Form 486 notification letter for your reference.

Please let me know if I may be of further assistance.

.  
. .  
. .  
. .  
. .  
. .

Technology & Information Systems  
Houston Independent School District  
3830 Richmond Avenue, Level 2 East  
Houston, TX 77027  
713-892-6222  
713-892-6749 (facsimile)

## facsimile transmittal

Attn: Joan Da Silva Facsimile: 973 599-6555  
From: Jacqueline Martin Date: Sept 15, 2004  
Re: FRN 1000282 reason for service Pages: 9 ( including the cover page)  
delivery extension  
cc: \_\_\_\_\_

☐ Urgent ☒ For Review ☐ Please Comment ☐ Please Reply ☐ FYI

Ms. Da Silva,

Regarding your email dated Sept 14, 2004, the reason for the service delivery extension for FRN 1000282 is the following:

Service Provider needs additional time to complete the project associated with this FRN 1000282 since the Form 486 was not approved until March 10, 2004. Projects scheduled to begin October 2003 were started, then halted later in November 2003 due to non-release of funds. The service provider is unable to complete work at the reminder of the 235 schools represented in this FRN by 9/30/2004 due to the untimely approval of the Form 486.

I have attached a copy of the Form 486 notification letter for your reference.

Please let me know if I may be of further assistance.

Sincerely,



Jacqueline Martin  
jmartin6@houstonisd.org

**Re: CC DOCKET NO. 96-45 and CC DOCKET NO. 97-21**  
**Appeal of Denial of Service Delivery Extension Request by USAC, Schools**  
**and Libraries Division**

**Dated FCC Form 486 Notification Letter**

Schools and Libraries Division  
Box 125 - Correspondence Unit  
80 South Jefferson Road  
Whippany, New Jersey 07981

Jan 186  
Notification letter

INTERIOR COMMUNITY  
90%  
FARM  
RELE

786 10/11/11

00121  
HOUSTON INDEP SCHOOL DISTRICT  
JACQUELINE MARTIN  
3830 RICHMOND AVE  
HOUSTON, TX 77027-5802

